REMARKS

In view of the above amendments and following remarks, reconsideration of the objections and rejections contained in the Office Action of January 11, 2010 is respectfully requested.

Drawing Objections

On page 2 of the Office Action, the Examiner objected to Fig. 16 because of the reference line for reference numeral 91 and its arrow head. This has been corrected in the above drawings.

The Examiner objected to Figs. 17-19 and 21 (sic) based upon reference number 121. This matter has also been corrected.

The Examiner objected to Figs. 1-3 based on reference numeral 1a, alleging that the lead line was unclear because the corresponding description discloses that the reference character does not indicate that the surface that is shown by the line looking along the direction of the arrow. However, this is incorrect. Reference 1a correctly points to pallet 1a shown in each of these figures.

The Examiner further objected to Figs. 4 and 5 based upon reference number 5. This matter has been changed above.

The Examiner further objected to Figs. 14-16 and 18 based upon reference numbers 1b, 91 and 1d. However, each of these reference lines with arrow heads correctly points to the portion described in the specification.

The Examiner further objects to Figs. 17-19 and 21 (sic). Reference characters 121 have been amended above. Reference characters 1c, 1d, 1e and 1f correctly point to the objects described.

Accordingly, by the above amendments, all of the objections that have been raised by the Examiner have either been corrected, or the Examiner's objections have been traversed.

Objection to Disclosure

The Examiner objected to paragraph 3 of the specification based upon the language as quoted by the Examiner at the top part of page 5 of the Office Action. However, this language was changed in the previous response, and thus the Examiner's objection is moot.

At the top of page 7 of the Office Action, the Examiner objected to the meaning of the language "mirror face" and the values "1S" and "1.6S". The Examiner's attention is directed to the previous response.

Objections to Claims

The Examiner objected to claims 28 and 29 as not further limiting the subject matter of claim 27. This position by the Examiner is respectfully traversed as being incorrect.

Claim 28 specifies that an adhesive material is provided in the main body, and the first adhesive holding region and the second adhesive holding region are on a surface of the adhesive material. Claim 29 further specifies that the first adhesive holding region and the second adhesive holding region are within one area of the adhesive material on the main body. There is no reference to an adhesive material in claim 27. The Examiner's interpretation of the claim language of claim 27 based upon the specification is an interpretation and an importation of limitations from the specification. The inherency referred to by the Examiner is not necessarily required in interpreting the claim language. The scope of the claims as interpreted by a court might, for purposes of argument, be in a manner as proposed by the Examiner, but might not. It is submitted that Applicants are entitled to draft their claims in a manner to cover different possible interpretations.

The Examiner further objects to claim 44 as being a substantial duplicate of claim 27. However, claim 44 claims a pallet, while claim 27 claims a substrate holder. It is quite possible that a pallet may be considered to a more limiting statement than "a substrate holder." As such, Applicants are entitled to draft their claim in this manner.

Claim 47 has been canceled and claim 49 has been amended to depend from claim 45. Thus, the objections to these two claims should clearly be overcome.

Rejection based upon 35 U.S.C. § 101 and 112

The Examiner rejects claim 51 alleging that the claim is directed to both a product and a process of using the product. This position by the Examiner is submitted to be incorrect.

The language of claim 51 is to the substrate holder of claim 45, a product, or apparatus. The claim states that the adhesive holding layer is formed on the main body so that the adhesive holding layer remains on the main body upon separation of a circuit board from the holding

surface. Thus, it is defining a characteristic of the adhesive holding layer that is caused by its formation. It is not claiming the process of formation or the process of separation, but rather the characteristic of the adhesive holding layer as such.

Rejections based upon 35 U.S.C. § 103

By the above, each of the independent claims have been amended to recite that not only is the first tackiness less than the second tackiness, but the first adhesive holding region overlaps the circumference portion of the circuit board and the second adhesive holding region overlaps a central portion of the circuit board.

The distinctions between the present invention and the references that have been cited by the Examiner have been thoroughly discussed previously. The Examiner now adds the reference to Adams, U.S. Patent Publication No. 2003/0031819. Adams, as well as the other references cited by the Examiner, fails to disclose that a second adhesive holding region is surrounded by a first adhesive holding region that has a tackiness different from that of the second adhesive holding region. In addition, each of these references fails to disclose that the first adhesive holding region overlaps the circumference portion of the circuit board and that the second adhesive holding region overlaps the central portion of the circuit board. Kuhns and Adams both disclose RFID labels having an adhesive layer in which the adhesive strength is partially varied. However, there is no disclosure of the correspondence between the adhesive holding regions and the substrate holder and portions of a circuit board that adheres to the substrate holder.

In citing Adams, the Examiner cites that a second adhesive holding region 28 is partially surrounded by the first adhesive holding region 30. The Examiner also refers to a spiral. However, elements 28 and 30 are shown as linear portions in Figs. 4 and 5. Spiral shapes are illustrated in Figs. 7 and 9, none of which disclose or provide any reason to modify the other references so as to arrive at the presently claimed invention.

In view of the above amendments and remarks, it is submitted that the present application is now in condition for allowance, and the Examiner is requested to pass the case to issue. If the Examiner should have any comments or suggestions to help speed the prosecution of this application, the Examiner is requested to contact Applicants' undersigned representative.

Respectfully submitted,

Tatsuki NOGIWA et al.

/Nils E. Pedersen/ By 2010.04.12 10:51:57 -07'00'

> Nils E. Pedersen Registration No. 33,145 Attorney for Applicants

NEP/krg Washington, D.C. 20005-1503 Telephone (202) 721-8200 Facsimile (202) 721-8250 April 12 2010